

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE)	
CENTRE GMBH and WEST PUBLISHING)	
CORPORATION,)	
)	
Plaintiffs and)	
Counterdefendants,)	C.A. No. 20-613 (SB)
)	
v.)	
)	
ROSS INTELLIGENCE INC.,)	
)	
Defendant and)	
Counterclaimant.)	

**PLAINTIFFS' MOTION TO EXCLUDE CERTAIN TESTIMONY,
ARGUMENT, OR EVIDENCE REGARDING THE OPINIONS OF
BARBARA FREDERIKSEN-CROSS**

Plaintiffs Thomson Reuters Enterprise Centre GmbH and West Publishing Corporation (collectively, "Plaintiffs") respectfully move to exclude certain testimony, argument, or evidence regarding the opinions of Defendant ROSS Intelligence Inc.'s purported expert, Barbara Frederiksen-Cross.

The grounds for this Motion are set forth in Plaintiffs' Opening Brief in support of the Motion and accompanying exhibits and declarations, filed concurrently herewith. A proposed order is attached.

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/s/ Michael J. Flynn

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Certification Under D. Del. LR 7.1.1

Pursuant to D. Del. LR 7.1.1, undersigned counsel certifies that the foregoing motion was discussed during a teleconference with counsel for Defendant ROSS Intelligence Inc. on December 15, 2022, including Delaware and lead counsel for all parties. The parties were unable to reach agreement on the relief requested, and Plaintiffs understand that ROSS will oppose the motion.

/s/ Michael J. Flynn

Michael J. Flynn (#5333)

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[PROPOSED] ORDER

This Court, having considered Plaintiffs Thomson Reuters Enterprise Centre GmbH and West Publishing Corporation's (collectively, "Plaintiffs") Motion to Exclude Certain Testimony, Argument, or Evidence Regarding the Opinions of Barbara Frederiksen-Cross, and the related briefing and arguments thereto,

IT IS HEREBY ORDERED this ____ day of _____ 202__ that Plaintiffs' Motion to Exclude is **GRANTED**.

Dated: _____

The Honorable Stephanos Bibas

CERTIFICATE OF SERVICE

I hereby certify that on December 22, 2022, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on December 22, 2022, upon the following in the manner indicated:

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